



STATE OF WASHINGTON  
DEPARTMENT OF ECOLOGY

4601 N Monroe Street • Spokane, Washington 99205-1295 • (509)329-3400

October 3, 2013

Mr. Brian Nickel  
US EPA Region 10  
Spokane River NPDES Public Comments  
1200 6<sup>th</sup> Avenue  
Suite 900 M/S OWW-130  
Seattle, WA 98101

RE: Idaho Dischargers – Draft Permit Formal Comments

Dear Mr. Nickel:

Ecology appreciated the opportunity to attend the Idaho Discharger Workshop and Public meeting you held at the Coeur d'Alene Library last week. We feel that the draft permits are protective of downstream water quality and meet the intent of Washington State water quality rules for the Spokane River and Lake Spokane. Comments for the draft permits are relatively minor and can be found below. They apply to all three dischargers.

1. Currently, dissolved oxygen (DO) monitoring occurs only once per month. Ecology would like the EPA to consider increasing the DO monitoring to five (5) times per week for a more representative monitoring event. The facilities will be required to monitoring pH five times per week and we feel that including the additional parameter will not be burdensome on the facilities. Also, since the permits were written with the intention of protecting DO levels in Lake Spokane, the increased DO monitoring will help in the validation that our state water quality monitoring standards will be met.
2. The permits specify that analysis for PCB congeners must use EPA Method 1668, with target MDLs no greater than 10 picograms per liter per congener. You should note that EPA Method 1668C includes MDLs for individual congeners, many of which exceed the 10 pg/L target value. Ecology wants to ensure that the permit language will not exclude EPA Method 1668C as a preferred monitoring method. In addition, Ecology would like to ensure that the discharger's involvement in the Spokane River Toxics Task Force (SRRTTF) requires each facility to follow their recommended Quality Assurance Plan for toxics monitoring in the receiving water.
3. The Spokane River Metals TMDL for Cadmium, Lead, and Zinc requires waste load allocations for Washington dischargers as the more stringent of either end of pipe based



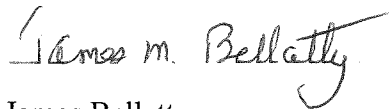
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on discharge hardness or performance based for each facility. We recommend that EPA use the same method of calculation of the Idaho dischargers.

Please inform Ecology when you have finalized and formally issued the permits. We would like to also be allowed access to review monthly DMRs from each of the three dischargers. Ecology also respectfully requests a courtesy review of the required toxics monitoring quality assurance plans to confirm the monitoring protocols meet the same requirements as Washington dischargers.

We again appreciate your review of these comments and look forward to the issuance of the Idaho discharge permits for the Haden Regional Area Sewer Board, and the Cities of Post Falls and Coeur d'Alene.

Sincerely,

A handwritten signature in cursive script that reads "James M. Bellatty".

James Bellatty  
Section Manager  
Water Quality Program

JB:DW:red